

**NORFOLK
SOUTHERN**

DOCKET FILE COPY ORIGINAL

Norfolk Southern Corporation
99 Spring Street S W
Atlanta Georgia 30303
404/529-1216

RECEIVED

G. J. Sniffen, Jr.
Assistant Vice President
Communications and Signals

APR 21 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 16, 2003

Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Madam Secretary:

Re: RM No. 10687—Opposition

Norfolk Southern Railway Company ("NS") hereby responds to the FCC's Public Notice, Report No. 2601, released on 26 March 2003, announcing the request of the Industrial Telecommunications Association ('ITA') to be certified by the FCC as a coordinator for railroad mobile radio frequencies in the United States.

NS has a vital interest in this matter. We operate approximately 21,500 route miles in 22 eastern states, the District of Columbia and the province of Ontario, Canada. Our rail network serves 20 ports and connects with rail partners in the East, West and in Canada, linking our customers to markets around the world.

Mobile radio communications is a key component in the day-to-day operations of our railroad (and every other railroad in the U.S. and Canada), and proper frequency coordination is essential for ensuring that our radio networks operate in a manner that is safe, effective and free from interference. It is because of the extreme importance of the frequency coordination function for the safety of railroad operations that NS opposes ITA's request to become certified as a frequency coordinator for railroad mobile radio channels.

NS is familiar with the "Opposition of the Association of American Railroads (AAR)" filed in this proceeding (RM-10687). NS is in complete agreement with AAR's views expressed in that document, and believes that AAR should continue as the sole frequency coordinator for railroad channels in the U.S. AAR has **served well** in that capacity for decades, and NS sees no reason to change. Because it is a membership organization and a trade association, AAR is controlled by and answerable to its members. In this regard, NS and AAR's other members consider it very important that AAR's frequency coordination staff include persons who are knowledgeable and experienced in railroad operations.

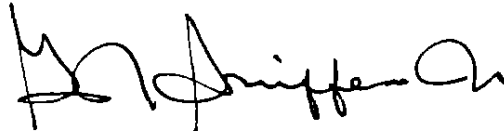
014

Page 2
April 16, 2003

Given the complexity, scope and uniqueness of railroad communications networks (as described in detail in **AAR's** Opposition), knowledge of rail operations is essential to assure proper frequency coordination decisions concerning railroad mobile radio systems. If entities such as ITA, which have no connection with or knowledge of the railroad industry, are allowed to perform the frequency coordination function, that assurance would be lost, and safe and effective railroad communications could be jeopardized.

In summary, NS agrees with AAR that ITA's request should be denied.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. J. Sniffer, Jr.", with a stylized, cursive script.

G. J. Sniffer, Jr.

cc: Mr. Jeremy Denton
Industrial Telecommunications Assoc.
1110 N. Glebe Road, Suite 500
Arlington, VA 22201